

Amanda Reiber

From: JR Casillas
Sent: Monday, November 08, 2021 10:00 AM
To: Amanda Reiber
Subject: FW: [EXTERNAL] Goettsche Settlement Agreement--a new issue
Attachments: 20210401 Birenbaum Statement of Claim Final.pdf; 2020-08-03 - FIRST AMENDED COMPLAINT FOR DAMAGES FOR 1. BREA 19922476_1.PDF

J.R. Casillas, Shareholder



Datsopoulos, MacDonald & Lind, P.C.

201 W. Main Street, Suite 201 Missoula, MT 59802

Phone: 406.728.0810 | Fax: 406.543.0134

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From: Peter Lacny <PLacny@dmlaw.com>
Sent: Friday, September 17, 2021 3:42 PM
To: Benjamin J. A. Sauter <Benjamin.Sauter@kobrekim.com>
Cc: Josh Kalish <josh@ogslawllc.com>; JR Casillas <JRCasillas@dmlaw.com>
Subject: RE: [EXTERNAL] Goettsche Settlement Agreement--a new issue

Gentlemen;

Sorry for delay.

I am attaching the Complaint and the Arbitration Statement of Claim.

The CA Complaint was stayed and Arbitration compelled.

Let me know if you need anything further,

Peter F. Lacny, Shareholder



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From: Benjamin J. A. Sauter <Benjamin.Sauter@kobrekim.com>
Sent: Thursday, September 16, 2021 6:00 PM

Exhibit I

To: Peter Lacny <PLacny@dmlaw.com>

Cc: Josh Kalish <josh@ogslawllc.com>; JR Casillas <JRCasillas@dmlaw.com>

Subject: Re: [EXTERNAL] Goettsche Settlement Agreement--a new issue

Peter,

We're reviewing and will get back to you. Are you able to send us the complaint in the case?

Benjamin J. A. Sauter
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On Sep 16, 2021, at 7:50 PM, Peter Lacny <PLacny@dmlaw.com> wrote:

Gentlemen;

I write again on a separate but related issue.

In this case, we represent Atlas Power. We are being sued by Evan Birenbaum and the matter is in arbitration.

We were recently served with the attached discovery requests.

The Settlement Agreement between Mr. Goettsche and Mr. Washington and related entities is responsive to this request. Due to the confidentiality clause of the Agreement, I am writing to get your position on disclosing the agreement in response to this discovery request.

We have already confirmed with Mr. Birenbaum's counsel that he would agree to a protective order that the Settlement Agreement cannot be otherwise disclosed.

My partner JR Casillas is CC'd on this email.
Thank you both for your time,

Peter F. Lacny, Shareholder

<image001.jpg>

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<2021-09-10 Jurisdictional Disocvery to Atlas.pdf>